



Yisroel Schulman, Esq. President

**By Facsimile**

March 10, 2008

Hon. Loretta A. Preska  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

Re: Belovic v. Doar, 07 Civ. 2876 (LAP) (KNF)

Dear Judge Preska:

I am co-counsel for Plaintiffs in the above-referenced case, and I write regarding your March 7, 2008 Order, which granted City Defendant's request for an extension to respond to Plaintiffs' February 15, 2008 letter until March 24, 2008. Plaintiffs request that the Court schedule a conference with all parties for the week of March 24.

The discovery at issue, and the subject of the February 15 letter to the Court as well as Plaintiffs' January 16 letter to the Court, was due in December 2007; it is now March 2008. We have the utmost respect and sympathy for Mr. Kitzinger and his family at this very difficult time. However, we continue to have an obligation to our clients to expeditiously move this case forward and to seek proper relief for them. Ongoing delays in discovery production have plagued this case and result in harm to all the members of the class. Members of the class are currently facing eviction, the loss of health care coverage, food stamps, and other government benefits as a result of APS's continual failures, and the paralysis in which this case is stuck due to City Defendant's discovery delays prevents Plaintiffs from obtaining relief. Other attorneys in the Corporation Counsel's office are counsel of record and are quite familiar with this case, perhaps even more familiar than Mr. Kitzinger, who only joined the litigation earlier this year, and they should be able to work with the Court and Plaintiffs to put this case back on track.

Accordingly, Plaintiffs request a conference at Your Honor's earliest convenience, if possible the week of March 24, to discuss the outstanding discovery issues and all appropriate remedies for City Defendant's continuing violation of the deadlines in the December 7 Order.

*Counsel shall participate in a telephone conference on March 24 at 3:30pm. Counsel shall arrange the call. So ordered.*

Respectfully,

Jane Greengold Stevens

One of the Attorneys for the Plaintiffs

Cc: (by email)

*Loretta A. Preska**USOg**March 12, 2008*

Stephen Kitzinger  
Stephen D. Weber  
Robert Kraft  
Ivan Rubin  
Claire P. Gutekunst